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ATTORNEYS FOR DEFENDANTS
POWELL VALLEY HEALTHCARE, INC.,
POWELL HOSPITAL DISTRICT NO. 1,
AND POWELL VALLEY HOSPITAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

A. W. D., by and through his)
Next Friends and Natural Parents,)
William K. and Mindy E. DuRose, WILLIAM)
K. DUROSE, and MINDY E. DUROSE,)
)
)
)
Plaintiffs,)
)
vs.)
)
POWELL VALLEY HEALTHCARE, INC.,)
POWELL HOSPITAL DISTRICT NO. 1,)
POWELL VALLEY HOSPITAL, JEFFERY)
HANSEN, M.D., AND JOHN DOES 1 THROUGH)
10)
)
Defendants.)

Case No.: 13-CV-216-S

**POWELL VALLEY HEALTHCARE, INC., POWELL HOSPITAL DISTRICT NO. 1,
AND POWELL VALLEY HOSPITAL'S DESIGNATION OF EXPERT WITNESSES**

COME NOW Defendants, Powell Valley Healthcare, Inc., Powell Hospital District No. 1, and Powell Valley Hospital (hereinafter referred to collectively as "Defendants") by and through its undersigned counsel of Williams, Porter, Day & Neville, P.C. and pursuant to Rule 26(a)(2) of

the Federal Rules of Civil Procedure hereby designate the following expert witnesses who may be called to testify at the trial of this matter. The Testimony of any expert designated herein may be offered live or by trial deposition.

RULE 26(a)(2)(B) RETAINED EXPERTS

1. John M. Janzen, Ed.D., CRC
7761 West Riverside Drive, Suite 120
Boise, ID 83714
Telephone: (208) 344-4285

A copy of Mr. Janzen's Curriculum Vitae is attached hereto as **Exhibit "A"** and incorporated herein as though fully set forth as a part of his designation. Mr. Janzen's Expert Report dated November 14, 2014, is attached hereto as **Exhibit "B"** and incorporated herein as though fully set forth as part of his designation. Mr. Janzen's fee schedule is attached hereto as **Exhibit "C"** and incorporated herein as though fully set forth as part of his designation. A listing of those cases in which Mr. Janzen has testified at trial or by deposition within the preceding four (4) years is attached hereto as **Exhibit "D"** and incorporated herein as though fully set forth as part of his designation. A list of Mr. Janzen's publications authored in the previous ten (10) years are set forth in his Curriculum Vitae and identified on page four (4) of his Curriculum Vitae. Mr. Janzen may testify concerning his education, background, training, and experience, and other matters addressed in his Curriculum Vitae.

The documents and information reviewed and considered by Mr. Janzen informing his opinions are set forth in his expert report and identified on page one (1) of his expert report dated November 14, 2014.

Mr. Janzen may also testify to all those matters addressed in his deposition if taken. Mr. Janzen may testify to any matter raised by any other expert listed by any party in such expert's designation or testimony.

Mr. Janzen's report will be supplemented upon completion of the remaining Independent Medical Evaluations, Functional Capacity Evaluation, and upon receipt of additional medical records which have recently been produced or which will be produced.

2. Anne Troike Stratton, M.D.
9064 E. 29th Place
Denver, CO 80238
Telephone: (720) 777-0948

A copy of Dr. Stratton's Curriculum Vitae is attached hereto as **Exhibit "E"** and incorporated herein as though fully set forth as a part of her designation. Dr. Stratton's Independent Medical Evaluation Report dated January 19, 2015, is attached hereto as **Exhibit "F"** and incorporated herein as though fully set forth as part of her designation. Dr. Stratton's fee schedule is attached hereto as **Exhibit "G"** and incorporated herein as though fully set forth as part of her designation. A listing of those cases in which Dr. Stratton has testified at trial or by deposition within the preceding four (4) years is attached hereto as **Exhibit "H"** and incorporated herein as though fully set forth as part of her designation. A list of Dr. Stratton's publications authored in the previous ten (10) years are identified on page one (1) and page two (2) of her Curriculum Vitae and incorporated herein as though fully set forth as part of her designation. Dr. Stratton may testify concerning her education, background, training, and experience, and other matters addressed in her Curriculum Vitae. Dr. Stratton may testify concerning her Independent Medical Evaluation of Plaintiff, A.D.

The documents and information reviewed and considered by Dr. Stratton informing the opinions set forth in her expert report dated January 19, 2015 are as follows: (1) Plaintiffs' Witness Disclosure; (2) Plaintiffs' First Supplemental Expert Witness Disclosure; (3) Complaint; (4) Defendants' Answer; (5) Medical Records - Bates No. MRP 13-21 OM 000594-000599; Bates No. MRP 13-21 Quenemoen 000568-000574; Bates No. MRP 13-21 SH 000600-000610; Bates

No. MRP 13-21 SVPN Heart 000575-00593; (6) Powell Valley Hospital Medical Records; (7) St. Vincent Medical Records; (8) Cody Clinic Medical Records; (9) Yellow Stone Imaging Medical Records; (10) West Park Hospital Medical Records; (11) Ortho Montana Medical Records; (12) Barrett Hospital Medical Records; (13) Dillon Middle School Records; (14) Dr. Micken Clinical Records; (15) Dr. Potter/Dr. Madany Medical Records/Radiology Report; (16) Dr. Hassler Medical/Clinical Records; (17) Plaintiffs' Amended Answers to Defendant Hansen's First Interrogatories; (18) Plaintiffs' Amended Responses to Defendant Hansen's First Requests for Production; (19) Plaintiffs' First Supplemental Answers to Defendant Hansen's First Interrogatories; (20) Deposition of A.D.; (21) Deposition of Dr. Hansen; (22) Deposition of Dr. Reib; (23) Deposition of Mindy DuRose; and (24) Deposition of William DuRose.

Dr. Stratton may also testify to all those matters addressed in her deposition if taken. Dr. Stratton may testify to any matter raised by any other expert listed by any party in such expert's designation or testimony.

Dr. Stratton's report may be supplemented upon completion of the remaining Independent Medical Evaluations, Functional Capacity Evaluation, and upon receipt of additional medical records which have recently been produced or which will be produced.

RULE 26(a)(2)(B) NON-RETAINED EXPERTS

Defendants hereby designate healthcare providers, including but not limited to, mental health counselors, providers, psychiatrist, physicians, and surgeons, who have treated or provided health care services to Plaintiff, A.D., prior to the filing of the above captioned matter and through the dates of trial. These health care providers are expected to testify concerning their education, background, training, and experience. These health care providers are expected to testify concerning Plaintiff's medical diagnosis, medical prognosis, illnesses, symptomology, care and

treatment, and recovery pertaining to his previous, current, and future medical conditions. These health care providers are expected to testify concerning their medical records which have been produced during the course of discovery. The facts and opinions of the healthcare providers are contained in their medical records which have been produced during the course of discovery. Defendants reserve the right to supplement this designation as further information becomes available.

OTHER PARTIES' EXPERTS

Defendants reserve the right to call as a witness at trial the experts listed by all other Parties. DEFENDANTS HEREBY SPECIFICALLY INCORPORATE AND JOINTLY DESIGNATE ALL EXPERTS DESIGNATED BY DEFENDANT JEFFERY HANSEN, M.D.

REBUTTAL EXPERTS

Defendants reserve the right to call any expert necessary for rebuttal purposes.

SUPPLEMENTATION

Defendants reserve the right to supplement this designation as further information becomes available.

DATED this 30th day of January, 2015.

POWELL VALLEY HEALTHCARE, INC., POWELL
HOSPITAL DISTRICT NO. 1, POWELL VALLEY
HOSPITAL.

/s/ Brian J. Marvel

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ATTORNEYS FOR THE DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via electronic transmission this 30th day of January, 2015.

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/s/ Brian J. Marvel

Brian J. Marvel